

# MEMO ENDORSED

December 20, 2007

**VIA FACSIMILE (212-805-7949)**

Honorable P. Kevin Castel  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

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Re: Jones v. Con Edison, et al., Case No. 07-CV-3211 (PKC)

Dear Judge Castel:

Counsel have conferred regarding discovery issues, and submit this joint letter in accordance with the Court's Orders of November 20 and 30, 2007.

Plaintiff's counsel has located Plaintiff and secured his execution of authorizations for the release of medical and other records necessary for discovery, and the authorizations have been received by the Con Edison defendants ("Con Edison"). However, as previously reported to the Court, Plaintiff's medical condition appears to impair his ability to contribute actively toward the expeditious prosecution of his action. Accordingly, Con Edison's counsel agrees to allow Plaintiff until February 15, 2008, to serve responses to Con Edison's first set of interrogatories and requests for production of documents, conditioned upon extension of all discovery deadlines by ninety days.

Counsel respectfully request extension of the discovery deadlines from February 11, 2008 to May 12, 2008 for fact discovery, and from April 30, 2008 to July 29, 2008 for expert discovery.

Thank you for your consideration of this request.

Respectfully submitted,

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*Joint application granted.  
Next conference is  
May 30, 2008 at 2:30 P.M.  
S 8 ORDERED  
12-21-07*